

Jared Richards, Esq.  
Nevada Bar No. 11254  
Dustin E. Birch, Esq.  
Nevada Bar No. 10517  
CLEAR COUNSEL LAW GROUP  
1671 W. Horizon Ridge Pkwy, Ste 200  
Henderson, Nevada 89102  
Telephone No.: (702) 476-5900  
Facsimile No.: (702) 924-0709  
[jared@clearcounsel.com](mailto:jared@clearcounsel.com)  
[dustin@clearcounsel.com](mailto:dustin@clearcounsel.com)  
*Attorneys for Plaintiff Brandon Mitchell*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

BRANDON MITCHELL, an individual;  
Plaintiff,

vs.

ROBERTINO SAZDOV, an individual;  
EAN HOLDINGS, LLC, a foreign limited  
liability company dba Enterprise Rent-A-  
Car; DOES I through XV; DOE  
EMPLOYEES I through X, and ROE  
CORPORATIONS I through X, inclusive,  
Defendants.

CASE NO.: 2:20-cv-02246-RFB-BNW

**STIPULATION AND ORDER TO PERMIT PLAINTIFF TO FILE AN AMENDED  
COMPLAINT**

IT IS HEREBY STIPULATED, by and between Plaintiff, BRANDON MITCHELL, through his attorneys, Jared R. Richards, Esq. and Dustin E. Birch, Esq. of Clear Counsel Law Group, and Defendant ROBERTINO SAZDOV, by and through his attorneys Madeline M. Arcellana, Esq. and Laura Rios, Esq. of Bremer Whyte Brown & O'Meara, LLP, that Plaintiff hereby be allowed to file his First Amended Complaint. A copy of the First Amended Complaint is attached hereto as **Exhibit 1**.

There will be no prejudice to any party, as no new parties are being added, discovery is still open, and no new claims are being made. Rather, Plaintiff's allegations and causes of action are clarified by the First Amended Complaint.

Dated this 28th day of December 2021.

CLEAR COUNSEL LAW GROUP

/s/ Dustin E. Birch

---

Dustin E. Birch, Esq.  
Nevada Bar. No. 10517  
1671 W. Horizon Ridge Pkwy, Suite 200  
Henderson, NV 89012  
*Attorneys for Plaintiff/Counter-Defendant  
Brandon Mitchell*

Dated this 28th day of December 2021.

BREMER WHYTE BROWN & O'MEARA

/s/ Laura Rios

---

Anthony Garasi, Esq.  
Nevada Bar No. 11134  
Madeline M. Arcellana, Esq.  
Nevada Bar No. 13816  
Laura Rios, Esq.  
Nevada Bar No. 15990  
1160 Town Center Drive, Suite 250  
Las Vegas, NV 89144  
*Attorneys for Defendant Robertino Sazdov*

#### ORDER

IT IS ORDERED that ECF No. 36 is GRANTED. The Clerk of Court is kindly directed to detach and separately file Exhibit 1 as the First Amended Complaint.

IT IS SO ORDERED

DATED: 12:58 pm, December 29, 2021



BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE